

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v

1:15-MJ-2428

ANTONIO VALDEZ,

Defendant.

WAIVER OF GRAND JURY PRESENTMENT

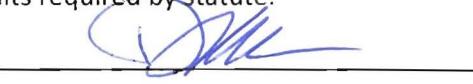
COMES NOW Defendant by and through the undersigned counsel and after having been advised of my right to have my case presented to the Grand Jury within 30 days of my arrest pursuant 18 U. S. C. 3161(b) on the charges contained in 15-mj-2428 and after having discussed this with my attorney I hereby freely and voluntarily waive my right to have my case presented to a grand jury and or indicted within 30 days from the date of my arrest. Understanding this right I waive time within which this matter must be brought to a Grand Jury and consent to it being continued from October 16, 2015 to and including December 16, 2015 a period of an additional 60 days from the original date of October 15, 2015 to facilitate further negotiations with the Government regarding the possible plea and disposition of this cause prior to presentment to the Grand Jury. I acknowledge that I have already waived time in this matter from July 16, 2015 to October 16, 2015 to enable the parties to obtain discovery and material pertinent to entering into a plea agreement with the Government and I understand that this waiver is for an additional 60 days plus the 90 days I have already waived for a total waiver of time of 150 days.

I specifically waive the time within which this matter must be brought to a Grand Jury and consent to it being continued from October 16, 2015 to December 16, 2015 for a period of an additional 60 days.

I further waive any rights to a speedy trial and consent to this extension as excludable delay as it is in the best interests of justice that this matter be delayed for further investigation which outweighs the public interest in assuring as accused of a speedy trial.


ANTONIO VALDEZ
Defendant

I have reviewed this waiver of presentment to a grand Jury over 30 days from arrest with Defendant and I believe it is in best interest to delay the presentment of this case to a Grand Jury in order to obtain full discovery and to facilitate a possible disposition of this cause before presentment to a Grand Jury within the time limits required by statute.


Daniel R. Marlowe